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Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

MARIA DEL CARMEN CASTEJON  
NAVA,

Defendant.

Case No: CR2005-131733-001-DT

**373 G.J. 384**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1 : ILLEGALLY  
CONDUCTING AN ENTERPRISE**, a  
Class 3 Felony, in violation of A.R.S. ' 13-  
2312

**COUNT 2 : TRAFFICKING IN THE  
IDENTITY OF ANOTHER PERSON OR  
ENTITY**, a Class 2 Felony in violation of  
A.R.S. ' 13-2010

**COUNTS 3-5 : FORGERY**, Class 4  
Felonies, in violation of A.R.S. ' 13-2002

**COUNT 6 : CRIMINAL POSSESSION  
OF A FORGERY DEVICE**, a Class 5  
Felony in violation of A.R.S. ' 13-2003

The Maricopa County Grand Jury accuses **MARIA DEL CARMEN CASTEJON NAVA**, charging on this 11th day of October, 2005, that in Maricopa County, Arizona:

**COUNT 1**

**(ILLEGALLY CONDUCTING AN ENTERPRISE)**

During a period of time beginning on or about September 7, 2005, and ending on or about September 30, 2005, the defendant **MARIA DEL CARMEN CASTEJON NAVA**, was employed by or was associated with an enterprise and conducted such enterprise=s affairs through racketeering or participated directly or indirectly in the conduct of an enterprise that she knew was being conducted through racketeering, in violation of A.R.S. ' ' 13-2312, 13-2301, 13-2002, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant **MARIA DEL CARMEN CASTEJON NAVA**, participated in the AMARCOS@ enterprise, which offered customers who called telephone number 602-518-4790 forged documents for sale.

**COUNT 2**

**(TRAFFICKING IN THE IDENTITY OF ANOTHER PERSON OR ENTITY)**

On or about September 7, 2005, defendant **MARIA DEL CARMEN CASTEJON NAVA**, knowingly sold, transferred or transmitted any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of the other person or entity for any unlawful purpose or to cause loss to the

person or entity whether or not the other person or entity actually suffers any economic loss, in violation of A.R.S. ' ' 13-2010, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant **MARIA DEL CARMEN CASTEJON NAVA** knowingly sold two false documents bearing the name Daniel Sanchez Fiero and a false document bearing the name Daniel Sanchez Friaro to an undercover officer.

**COUNT 3**

**(FORGERY)**

On or about September 7, 2005, defendant **MARIA DEL CARMEN CASTEJON NAVA** with the intent to defraud, falsely made, completed or altered a written instrument, in violation of A.R.S. ' ' 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant **MARIA DEL CARMEN CASTEJON NAVA** manufactured a false Arizona Driver=s License bearing the name Daniel Sanchez Fiero.

**COUNT 4**

**(FORGERY)**

On or about September 7, 2005, defendant **MARIA DEL CARMEN CASTEJON NAVA** with the intent to defraud, falsely made, completed or altered a written instrument, in violation of A.R.S. ' ' 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant **MARIA DEL CARMEN CASTEJON NAVA** manufactured a false State of Arizona AIssued Arizona Certified Identification@ bearing the name Daniel Friaro Sanchez.

**COUNT 5**

**(FORGERY)**

On or about September 7, 2005, defendant **MARIA DEL CARMEN CASTEJON NAVA** with the intent to defraud, falsely made, completed or altered a written instrument, in violation of A.R.S. ' ' 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant **MARIA DEL CARMEN CASTEJON NAVA** manufactured a false Social Security card bearing the name Daniel Sanchez Fiero.

**COUNT 6**

**(CRIMINAL POSSESSION OF A FORGERY DEVICE)**

On or about September 30, 2005, defendant **MARIA DEL CARMEN CASTEJON NAVA** knowingly possessed a device, apparatus, equipment, software, access device, article, material, good, property, or supply adaptable for use in forging written instruments with intent to use it or to aid or permit another to use it for purposes of forgery, in violation of A.R.S. ' ' 13-2003 (A)(2), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant **MARIA DEL CARMEN CASTEJON NAVA** possessed a computer, monitor, scanner, card printer, typewriter, card stock, blank birth certificates, laminate, blank Mexican drivers licenses and birth certificates and blank Arizona Security Guard identification cards.

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(“A True Bill”)

TERRY GODDARD  
ATTORNEY GENERAL  
STATE OF ARIZONA

Date: October 11, 2005

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Todd C. Lawson  
ASSISTANT ATTORNEY GENERAL

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FOREPERSON OF GRAND JURY